

A CRITICAL OVERVIEW OF
THE BEST PRACTICES GUIDE

SBT AVERS THAT THE *BEST PRACTICES GUIDE* (BPG) FAILS TO PROVIDE A COMPREHENSIVE GUIDELINE FOR THE TIMELY AND EFFECTIVE RESOLUTION OF INTERFERENCE ISSUES, INSTEAD PROVIDING NOTHING MORE THAN A SERIES OF LOOSELY WORDED SUGGESTIONS OSTENSIBLY AIMED AT RESOLVING INTERFERENCE AT SOME UNDEFINED FUTURE DATE. THESE SUGGESTIONS PROVIDE NO GUIDANCE OR DIRECTIVE REGARDING ALLOCATION OF THE COSTS INVOLVED IN SOLVING THE INTERFERENCE PROBLEMS, RESOLUTION TIME FRAME, ASSESSMENT OF RESPONSIBILITY FOR RESOLUTION, METHOD OF TESTING, RESOLUTION OF DISPUTED FINDINGS, AND OTHER ISSUES. RELIANCE ON THE 'SYSTEM' ESPOUSED IN THE BPG AS THE SOLUTION TO INTERFERENCE RESOLUTION THROUGH CODIFICATION OF THE BPG WOULD SIMPLY MAINTAIN THE *STATUS QUO* BY ALLOWING INTERFERENCE TO CONTINUE FOR LONG PERIODS AFTER THE PROBLEM HAS ARISEN AND FAILING TO CLEARLY IDENTITY OF THE PARTY RESPONSIBLE FOR SOLVING THE PROBLEM. IF THE COMMISSION IS TO CODIFY AN INTERFERENCE RESOLUTION MECHANISM, IT MUST PROVIDE A LEVEL OF DETAIL AND A FINITE PROCEDURE THAT ARE ENTIRELY ABSENT FROM THE BPG.

THE BPG ESSENTIALLY CREATES NO MORE THAN AN AMORPHOUS TWO STEP PROCESS FOR INTERFERENCE RESOLUTION. STEP ONE CONSISTS OF DETERMINING WHO IS CAUSING THE INTERFERENCE; STEP TWO CONSISTS OF FIXING THE PROBLEM, AND SUGGESTIONS FOR RESOLUTION ARE OFFERED. ANY SERIOUS EFFORT AT RESOLVING INTERFERENCE MUST BE FAR MORE AMBITIOUS AND SYSTEMATIC THAN THE BPG. THE NUMEROUS SHORT-COMINGS OF THE BPG, IN PRACTICAL APPLICATION ARE EASY TO IDENTIFY. THE BPG'S FIRST SUBSTANTIVE SUGGESTION FOR THE RESOLUTION OF INTERFERENCE IS FOR THE ENTITY RECEIVING INTERFERENCE TO DETERMINE WHO IS CAUSING SUCH INTERFERENCE: "[THE ENTITY RECEIVING INTERFERENCE] SHOULD CONTACT THE CMRS CARRIERS OPERATING IN THE AFFECTED AREA." *BEST PRACTICES GUIDE* AT V. A. IN A PERFECT WORLD, THIS SUGGESTION MAY PROVE EFFECTIVE, BUT IN REALITY THIS TASK IN AND OF ITSELF IS BOTH AN UNWIELDY BURDEN AND AN EXTREME IMPEDIMENT TO THE TIMELY RESOLUTION OF THE INTERFERENCE PROBLEM. THE BURDEN OF DETERMINING WHO IS CAUSING THE INTERFERENCE IS CUMBERSOME AS THERE ARE BOUND TO BE NUMEROUS CMRS CARRIERS OPERATING IN CLOSE PROXIMITY TO ANY PLACE AT WHICH INTERFERENCE IS RECEIVED. THIS IS THE CASE BOTH BECAUSE OF THE TENDENCY FOR ENTITIES TO CO-LOCATE TRANSMITTERS ON THE SAME TOWERS, AND DUE TO THE PROLIFERATION OF CMRS CARRIERS IN THE MARKET TODAY.

THE TASK OF IDENTIFYING THE INTERFERING PARTY IS FURTHER COMPLICATED BY THE FACT THAT EA AND BEA LICENSEES ARE NOT REQUIRED TO REGISTER THEIR TRANSMISSION SITES WITH THE COMMISSION; AND THEREFORE, A PARTY RECEIVING INTERFERENCE MAY BE ENTIRELY UNABLE TO DETERMINE THE SOURCE EVEN BY REFERENCING THE COMMISSION'S RECORDS. WITH NO WAY TO IDENTIFY THE SOURCE OF THE INTERFERENCE WITH ANY CERTAINTY, THE VICTIMS OF INTERFERENCE MAY REMAIN STUCK AT THE BPG'S FIRST STEP FOR AN UNREASONABLE PERIOD OF TIME. CONFRONTED WITH THIS DEARTH OF INFORMATION, UNDER THE SYSTEM PROPOSED BY THE BPG, AN ENTITY MAY FIND ITSELF CALLING ALL CMRS CARRIERS IN THE NATION WITH LITTLE MORE THAN AN ADDRESS OR LOCATION AND AN INQUIRY REGARDING WHETHER THE CARRIER BELIEVES IT IS THE SOURCE OF THE PROBLEM. SUCH CALLS ARE UNLIKELY TO ELICIT A GREAT DEAL OF COOPERATION, AND SUCH INFORMATION AS IS AVAILABLE WILL IN MOST INSTANCES BE INSUFFICIENT TO IDENTIFY THE SOURCE OF INTERFERENCE. FOR THESE REASONS, THE BPG'S

CONCEPT OF PLACING THE BURDEN OF IDENTIFYING THE INTERFERING PARTY ON THE PARTY RECEIVING INTERFERENCE IS MISGUIDED. SUCH A TASK SHOULD BE HANDLED BY AN ENTITY THAT IS ADEPT AT SUCH TASKS AND CAPABLE OF GLEANING FROM THE AVAILABLE INFORMATION THE ENTITIES MOST LIKELY CAUSING SUCH INTERFERENCE. FURTHERMORE, THE SBT STRONGLY AVERS THAT IT IS ESSENTIAL THAT ALL TRANSMISSION SITES BE REGISTERED WITH SOME ENTITY REGARDLESS OF THE TYPE OF LICENSE THEY ARE ASSOCIATED WITH. THE VALUE OF HAVING ALL SUCH INFORMATION ON RECORD FAR OUTWEIGHS ANY BURDEN CREATED BY SUCH AN OBLIGATION.

THE BPG'S SECOND STEP TOWARDS INTERFERENCE RESOLUTION IS THE SUGGESTION THAT ENTITIES RECEIVING INTERFERENCE SHOULD COOPERATE IN TESTING TO DETERMINE THE CAUSE AND EXTENT OF THE INTERFERENCE RECEIVED, AND "SHOULD COOPERATE TO DETERMINE THE MOST EFFICIENT ALLOCATION OF COSTS AND RESOURCES NECESSARY FOR INTERFERENCE MITIGATION, TAKING INTO ACCOUNT THE COSTS AND BENEFITS OF MITIGATIVE ACTIONS." BEST PRACTICES GUIDE AT V.A. WHILE UNDOUBTEDLY, SUCH COOPERATION MUST OCCUR, THE BPG PROVIDES NO SOLUTION FOR INTERIM STEPS TO RESOLVE SUCH INTERFERENCE, AND CERTAINLY NO IMMEDIATE RELIEF. FIREMEN IN A BURNING BUILDING, POLICE OFFICERS CLEARING THE SITE OF A BOMB THREAT, AND AN AMBULANCE SQUAD CALLING A HOSPITAL FOR INSTRUCTIONS REGARDING AN IMMOVABLE PATIENT ARE IN NEED OF IMMEDIATE RESOLUTION OF THE INTERFERENCE PROBLEMS FACING THEM. THEY REQUIRE THE ABILITY TO HAVE THE INTERFERENCE ADDRESSED WHILE THEY CONDUCT THEIR WORK, NOT TO HAVE THE INTERFERENCE ADDRESSED FOLLOWING SEVERAL MONTHS OF TESTING AND NEGOTIATION. THE BPG DOES NOT ADDRESS EMERGENCY SITUATIONS AND THEREFORE RISKS THE LIVES OF PUBLIC SAFETY PERSONNEL AND THE CITIZENS OF THIS NATION NEEDLESSLY. CASES OF INTERFERENCE TO PUBLIC SAFETY ENTITIES CAN AND SHOULD BE ADDRESSED IMMEDIATELY, AND PERMANENTLY SOLVED WHEN TIME PERMITS. FURTHERMORE, DISPATCH SERVICE PROVIDERS SHOULD HAVE SOME IMMEDIATE RECOURSE FOR THEIR INTERFERENCE PROBLEMS WHEN SUCH PROBLEMS THREATEN THEIR BUSINESS, AND CERTAINLY WHEN THEY MAY THREATEN LIFE OR PROPERTY. NO LICENSEE SHOULD CONSIDER ITS FCC LICENSE AN AUTHORIZATION TO INTERFERE, AND ANY UNWILLINGNESS TO IMMEDIATELY ADDRESS INTERFERENCE CAUSED TO OTHER SYSTEMS IS INDICATIVE OF SUCH A PRESUMPTION ON THE PART OF A LICENSEE. INSOFAR AS THE BPG OFFERS NO SUCH MEANS OF IMMEDIATE RESOLUTION OF INTERFERENCE COMPLAINS, THE BPG OFFERS LITTLE SUBSTANTIVE RELIEF FROM INTERFERENCE.

TO ASSIST THE PARTIES IN THEIR NEGOTIATION OF THE PROPER MEANS OF RESOLVING THE IDENTIFIED INTERFERENCE PROBLEM, THE BPG OFFERS A LIST OF SUGGESTED APPROACHES TO INTERFERENCE RESOLUTION. THE SUGGESTED APPROACHES ARE RETUNING CMRS CHANNELS FURTHER AWAY FROM PUBLIC SAFETY OPERATOR'S CHANNELS, MODIFYING CMRS POWER LEVELS, ANTENNA HEIGHT AND ANTENNA CHARACTERISTICS, ASSURING PROPER OPERATION OF BASE STATION EQUIPMENT, IMPROVING LOCAL SIGNAL STRENGTH OF PUBLIC SAFETY COMMUNICATIONS, AND THE INCORPORATION OF FILTERS INTO CMRS SYSTEMS. BEST PRACTICES GUIDE V.A.1 & 2. WHILE ITS LIST OF SUGGESTED RESOLUTIONS IS FAIRLY COMPREHENSIVE, THE BPG OFFERS NO HIERARCHY OF SOLUTIONS. IN FAILING TO RANK THE SUGGESTED RESOLUTIONS IN ANY ORDER OR PROVIDE A SYSTEM FOR SELECTING A RESOLUTION METHOD WHEN A DISPUTE BETWEEN

METHODS EXISTS, ADHERENCE TO THE BPG COULD RESULT IN AN UNDUE AMOUNT OF TIME LOST WHILE THE PARTIES NEGOTIATE BETWEEN VARIOUS RESOLUTION OPTIONS. THIS NEGOTIATION MAY BE ONE SIDED AS THE PARTY RECEIVING INTERFERENCE MAY NOT HAVE SUFFICIENT MEANS TO PARTICIPATE MEANINGFULLY IN THE PROCESS OR AFFORD ANY SOLUTION INVOLVING CHANGES TO THEIR SYSTEMS.

THE AFFORDABILITY OF THE SUGGESTIONS PROFFERED IN THE BPG ARE THEMSELVES SUBJECT TO OBJECTION. IT IS THE POSITION OF THE SBT THAT THE SUGGESTIONS THAT CMRS CARRIERS ALTER THEIR SYSTEM TO PROTECT OTHER OPERATORS ARE FULLY ACCEPTABLE. ON THE OTHER HAND, THE SUGGESTION THAT THE ENTITIES RECEIVING INTERFERENCE OBTAIN NEW EQUIPMENT, ADD BASE STATIONS WITHIN THEIR CONTOURS, OR OTHERWISE MODIFY THEIR SYSTEM ARE UNDULY PUNITIVE. ADDING BASE STATIONS, IN MOST INSTANCES, IS A TREMENDOUS EXPENSE THAT MANY PUBLIC SAFETY AND DISPATCH ENTITIES SIMPLY CANNOT ENDURE. SUCH A SOLUTION ALSO IGNORES THE FACT THAT THESE ENTITIES ARE THE VICTIMS OF INTERFERENCE, NOT THE SOURCE. EVEN HANDED REMEDIATION OF INTERFERENCE ISSUES SHOULD APPROPRIATELY FOCUS ON MAKING CHANGES TO THE INTERFERING SYSTEM AS THAT SYSTEM IS CAUSING THE PROBLEM, AND THUS IS VIOLATING THE COMMISSION'S RULES AGAINST CAUSING HARMFUL INTERFERENCE. SHOULD THE COMMISSION ADOPT TECHNICAL SOLUTIONS AS A RESULT OF THE NPRM, SUCH SOLUTIONS WILL UNDOUBTEDLY INVOLVE A FUNDING MECHANISM FOR AFFECTING SUCH CHANGE, BUT THE BPG OFFERS NO SUCH MECHANISM AND FAILS ENTIRELY TO ADDRESS THE AFFORDABILITY OF THE SUGGESTED INTERFERENCE SOLUTIONS. THE FAILURE TO CONTEMPLATE MONETARY CONSIDERATIONS MAKES THE BPG IMPRACTICABLE AT BEST AND PUNITIVE AT WORST.

UNFORTUNATELY, THE BPG'S APPROACH AMOUNTS TO LITTLE MORE THAN DIRECTING AN AGGRIEVED PARTY TO PICK UP THE PHONE BOOK AND CALL AROUND TO FIGURE OUT 'WHO DONE IT,' FOLLOWED BY THE SUGGESTION THAT THE PARTY PARTICIPATE IN FIGURING OUT HOW TO FIX THE PROBLEM. WHILE IT IS NOT THE INTENTION OF THE SBT TO UNDULY CRITICIZE THE EFFORT OF THOSE PARTIES THAT PARTICIPATED IN DRAFTING THE BPG, THE SBT NOTE THAT THE BPG DOES NOTHING MORE THAN STATE THE OBVIOUS WITHOUT PROVIDING ANY FRAMEWORK FOR DETERMINING EITHER A TEMPORARY OR PERMANENT SOLUTION. THE COMMISSION'S RULES IN FEW, IF ANY, INSTANCES DEAL IN VAGUE SUGGESTIONS OR GUIDELINES, AND THERE IS NO REASON FOR SUCH TO BE THE CASE WITH INTERFERENCE RESOLUTION. THE BPG PROVIDES NO TIME FRAME FOR INTERFERENCE RESOLUTION, IT PROVIDES NO ASSESSMENT FOR EXPENSES TO THE PARTY RECEIVING INTERFERENCE, IT PROVIDES NO STRICT GUIDELINES FOR DETERMINING HOW TO RESOLVE THE SITUATION, AND IT PROVIDES NO HIERARCHY OF PREFERENCE AMONG POSSIBLE RESOLUTIONS. IN ESSENCE, THE BPG PROVIDES NO GREATER GUIDANCE REGARDING INTERFERENCE RESOLUTION THAN DO THE COMMISSION'S RULES AS CURRENTLY CONSTITUTED.

AMONGST THE MOST GLARING SHORT-COMINGS OF THE BPG IS THAT IT ADDRESSES ITSELF EXCLUSIVELY TO INTERFERENCE TO PUBLIC SAFETY SYSTEMS. WHILE IT IS UNDENIABLE THAT INTERFERENCE TO PUBLIC SAFETY SYSTEMS OFTEN HAS HIGHER STAKES INVOLVED THAN DOES INTERFERENCE TO COMMERCIAL AND PMRS SYSTEMS, THERE IS NO REASON TO SET UP AN INTERFERENCE GUIDELINE

THAT REFERENCES ONLY PUBLIC SAFETY INTERFERENCE. AMONG THE REASONS PUBLIC SAFETY SYSTEMS RECEIVE INTERFERENCE IS THE ANALOG EQUIPMENT COMMONLY UTILIZED IN SUCH SYSTEMS. THIS EQUIPMENT IS FUNCTIONALLY IDENTICAL TO THE EQUIPMENT USED BY THOUSANDS OF CMRS AND PMRS DISPATCH OPERATORS. IN FACT, NUMEROUS PUBLIC SAFETY ENTITIES RELY ON DISPATCH SERVICE RECEIVED FROM CMRS AND PMRS OPERATORS DUE TO THE AFFORDABILITY, PROLIFERATION AND AVAILABILITY OF SUCH SERVICE. THUS, THE OPPORTUNITY EXISTS TO OFFER INTERFERENCE SOLUTIONS FOR A FAR BROADER GROUP OF LICENSEES THAN IS THE FOCUS OF THE BPG. BY FOCUSING ON THE TYPES OF OPERATION THAT TENDS TO CAUSE INTERFERENCE AND THE TYPE OF EQUIPMENT THAT TENDS TO SUFFER FROM INTERFERENCE IT IS POSSIBLE TO OFFER INTERFERENCE RESOLUTION TO MOST LICENSEES RATHER THAN AN INSULAR SEGMENT OF LICENSEES.

IT IS ALSO IMPORTANT TO NOTE THAT THE INDIVIDUAL RECEIVING INTERFERENCE MAY NOT BE ABLE TO DETERMINE THE EXTENT OF SUCH INTERFERENCE, DETERMINE WHERE IT OCCURRED, HOW LONG IT PERSISTED, WHAT CHARACTERISTICS IT EXHIBITED, ETC. THE FACT IS THAT PUBLIC SAFETY PERSONNEL OR CUSTOMERS OF DISPATCH SYSTEMS ARE NOT THE PARTIES BEST SUITED TO DETERMINE WHO IS CAUSING THEM INTERFERENCE. SUCH A DETERMINATION SHOULD BE MADE BY AN ENTITY WITH RESOURCES DEVOTED TO SUCH MATTERS.

List of Commenting Parties

NEC America, Inc.	NEC	Carolina Power and Light Company/ TXU Business Services	Carolina Power
Access Spectrum, LLC	Access Spectrum	Cascade Two-Way Radio	Cascade
Ad Hoc Wireless Alliance	AHWA	Cellular Telecommunications & Internet Association	CTIA
Aeronautical Radio, Inc.	ARINC	Cinergy Corporation	Cinergy
Alltel Communications, Inc./ Cingular Wireless, Inc.	Alltel/Cingular	Cities of College City Texas, and Bryan Texas	College Station/ Bryan Austin
Ameren Corporation	Ameren	City of Austin	Austin
American Electronic Power Company, Inc.	AEP	City of Baltimore	Baltimore
American Mobile Telecommunications Association, Inc.	AMTA	City of Fort Lauderdale	Ft. Lauderdale
American Petroleum Institute	API	City of Gainesville	Gainesville
American Public Transportation Association	APTA	City of New York	NYC
American Radio Relay League, the National Association of Radio Operators	AARL	City of Portland	Portland
American Water Works Association	AWWA	Codington-Clark Electric Cooperative, Inc.	Codington-Clark Electric
Association of American Railroads	AAR	Commercial Radio and Television, Inc.	CRT
Association of Public-Safety Communications Officials International, Inc.*	APCO	Commonwealth of Virginia, Department of Information Technology	Virginia
AT&T Wireless Services, Inc.	AWS	Consumers Energy Company	Consumers
Avaya, Inc.	Avaya	Coupe Communications	Coupe
AVR, Inc.	AVR	Dallas Area Rapid Transit Authority	DART
Bergen County Police Department	Bergen County	Danny Hampton	Hampton
Blooston, Mordkofsky, Dickens, Duffy & Pendergast	Blooston	Delmarva Power & Light Company	Delmarva
Boeing Company	Boeing	Dennis Brown	Brown
Bosshard Radio Service	BRS	Department of Information Technology, Fairfax, VA	Fairfax
Business Autophones, Inc	BAI	Dobson Communications Corporation	Dobson
		Duke Energy Corporation	Duke
		E.F. Johnson Company	E.F. Johnson
		East River Electric Power Cooperative, Inc.	East River

Eastman Chemical Company	Eastman	Kenwood Communications Corporation	Kenwood
Entergy Corporation and Entergy Services	Entergy	King County (Washington)	King County
Exelon Corporation	Exelon	Lockheed Martin Corporation	Lockheed Martin
Federal Express, Inc.	FedEx	Lubrizol Corporation	Lubrizol
FEM Electric Association, Inc.	FEM	M/A-Com, Inc., a division of Tyco Electronics	MA-Com
Fischer Wireless Services	Fischer	Marnell Corrao Associates	Marnell
Florida Power and Light	FPL	Maui County Metropolitan Transit Authority of Harris County	Maui
Focus 2000 Communications Forestry Conservation Communications Association	Focus	Metropolitan Utilities District/ Omaha Public Power District	HC
Harmer Radio & Electronics, Inc.	FCCA	Motient Communications, Inc.	MUD/OPPO
H-D Electric Cooperative, Inc.	Harmer	Motorola, Inc	Motient
Holy Cross Electric Association, Inc.	H-D Electric	National Association of Counties*	Motorola
Illinois Power Company	Holy Cross	National Association of Manufacturers	NACo
Intel Corporation	IPC	National Association of Telecommunications Officers and Advisors*	NAM
International Association of Chiefs of Police, Major Cities Chiefs Association, National Sheriffs Association, Major County Sheriffs Association	Intel	National League of Cities*	NATOA
International Association of Fire Chiefs, Inc. & International Municipal Sign Association	IACP/MCC/NSA/MCSA	National Ready Mix Concrete Association	NLC
ISG Cleveland, Inc.	IAFC/IMSA	National Rural Electric Cooperative Association	NRMCA
Island SMR	ISG	National Rural Telecommunications Cooperative	NRECA
Jones Onslow Electric Membership Corporation	Island SMR	New Jersey Transit Authority	NRTC
Kankakee Valley Rural Electric Membership Corporation	Jones Onslow EMC	New York City Transit Authority	NJ Transit
		Nextel Communications, Inc	NYCT
		Northern Electric Cooperative	Nextel
	KVREMC		Northern Electric

Office of the Chief Technology Officer, Government of the District of Columbia	DC	Society of Broadcast Engineers, Inc.	SBE
Ohio Multi Agency Radio Communications System	MARCS	Southeastern Electric Cooperative, Inc.	Southeastern Electric Southern
Pinnacle West Capital Corporation Preferred Communications Systems, Inc.	Pinnacle	Southern Linc Southwest	
Private Wireless Coalition	PCSI	Louisiana Electronic Membership Corporation	SLEMCO
Professional Communications Public Safety Improvement Coalition	PWC	Spectrum Clearing Alliance	SCA
Public Safety Wireless Network Program	PC	State of Arizona	Arizona
Qualcomm, Inc.	PSIC	State of Florida	Florida
RadioSoft		State of Hawaii	Hawaii
RCC Consultants, Inc		State of Maryland Department of Budget and Management Office of Technology	
Regional Communications System		Telecommunications Industry Association	Maryland
Renville Sibley Cooperative Power Association	PSWN	United States Cellular Corporation	TIA
Richard C. Nowakowski	Qualcomm	United Telcom Council	U.S. Cellular
San Francisco Bay Area Rapid Transit District	RadioSoft	Utah Communications Agency Network	UTC
Satellite Industry Association	RCC	UTAM, Inc.	UCAN
Scana Corporation	RCS	UTStarcom, Inc.	UTAM
Shook, Hardy & Bacon, LLC		Verizon Wireless	UTStarcom
Shulman, Rogers, Gandal, Pordy & Ecker, P.A.	Renville-Sibley	Washington Electric Membership Corporation	Verizon
Sid Richardson Energy Services Co.	Nowakowski	Western Communications	Washington EMC
Skitronics, LLC		White County Rural Electric Membership Corporation, Inc.	Western
SmartLink	BART	Xcel Energy Services, Inc.	White County REMC
Snohomish County Emergency Radio System	SIA		Xcel
	Scana		
	Shook		
	Shulman		
	Richardson		
	Skitronics		
	SmartLink		
	SERS		

CERTIFICATE OF SERVICE

I, Jason Emala, hereby certify that on this 1st day of August, 2002, I caused a copy of the foregoing Reply Comments to be served by First Class U.S. Mail, postage prepaid, to the following:

N.Y.S. Office for Technology, Statewide Wireless
c/o Handford C. Thomas, Director
Department of Public Safety Network
6C Executive Park Drive
Albany, New York 12203

State of Arizona
Department of Public Safety
PO Box 6638
Phoenix, AZ 85005-6638

Public Safety Improvement Coalition
c/o James R. Hobson
Miller & Van Eaton, P.L.L.C.
1155 Connecticut Ave., NW Suit 1000
Washington, DC 20036

Ron Solemsaas, Project Coordinator
Snohomish County (SERS)
1121 SE Everett Mall Way Ste., 210
Everett, Washington, 99202

Regional Communications System
c/o Curt Munro, Manager
Sheriff's Department
5555 Overland Avenue, Bldg., 12, MS-056
San Diego, CA 92123

Public Safety Wireless Network
c/o Brigadier General Paul H. Wieck II
Booz Allen & Hamilton
8283 Greensboro Drive
McLean, VA 22102
Attn: Greenwood Facility

Wireless Systems Manager
c/o Ronald G. Mayworm
PO Box 9960
College Station, TX 77842

Public Safety Wireless Network
c/o Steven Proctor, Executive Director
Booz Allen & Hamilton
8283 Greensboro Drive
McLean, VA 22102
Attn: Greenwood Facility

City of Bryan
Emergency Management Coordinator
c/o Roy G. Ross
PO Box 1000
Bryan, TX 77805

Fairfax County
Department of Information, Tech.
1200 Government Center Parkway
Ste., 527
Fairfax County, VA 20035

City of Austin, TX
c/o Michael Simpson, Wireless Comm. Serv. Officer
1006 Smith Road
City of Austin, TX 78721

Judy Chesser, Director
The City of New York Federal Affairs Office
1301 Pennsylvania, Ave., NW
Washington, DC 20004

New York City Department of Information
11 Metro Tech Center
Brooklyn, NY 11201
Attn: Atostino Cangemi, Deputy Commissioner and
General Counsel Technology and Telecommunications

Michael Ahlbaum, Special Counsel for Reg. Affairs
11 Metro Tech Center
Brooklyn, NY 11201

Nancy Jesuale, Bureau Director
City of Portland, Oregon
3732 SE 99th Avenue
Portland, OR 97266-2502

Commonwealth of Virginia
Department of Information Technology
Richmond Plaza Building
110 South 7th Street
Richmond, VA 22319-3931

Office of The Chief Technology Officer
Government of the District of Columbia
441 4th Street, NW, Suite 930
Washington, DC 20001

Norman B. Botsford, Chief of Police
City of Gainesville
PO Box 1250
Gainesville, FL 32602-1250

John Schmidig, Chief, County Police
Bergen County Police Department
327 East Ridgewood Avenue
Paramus, NJ 07652

Paul A. Einreinhofer, Sergeant
Bergen County Police Department
327 East Ridgewood Avenue
Paramus, NJ 07652

John E. Logan, Special Counsel
County of Bergen
1050 Connecticut Ave., NW 10th Fl.
Washington, DC 20036

Lester M. Nakamura, Adminstrator
State of Hawaii ICS Division
PO Box 119
Honolulu, Hawaii 96810-0119

Kevin Kearns, Manager
King County Information and
Telecommunications Serv., Divisions
700 5th Avenue, Suite 2300
Seattle, WA 98104-5002

The State of Maryland
Department of Budget and Maryland
c/o G. Edward Ryan, II
301 West Preston Street, Ste. 1304
Baltimore, MD 21201

Maui County
c/o James Kimo Apana
200 South High Street
Waikuku, Maui, HI, USA 96793

Cingular Wireless LLC
c/o J. R. Carbonell
5565 Glenridge Connector, Ste 1700
Atlanta, GA 30342

Dobson Communications Corporation
c/o Ronald L. Ripley, Esq.
14201 Wireless Way
Oklahoma City, OK 73134

United States Cellular Corp.
c/o George Y. Wheeler
Holland & Knights LLP
2099 Pennsylvania Ave., NW
Suite 100
Washington, DC 20006

Nextel Communications, Inc.
c/o Leonard Cascioli, VP- Engineer & Operations
2001 Edmund Halley Drive
Reston, VA 20191

Alltel Communications, Inc.
c/o Glenn R. Rabin
601 Pennsylvania Ave., NW Ste. 720
Washington, DC 20004

AT&T Wireless Services, Inc.
c/o Douglas I. Brandon, VP - External Affairs
1150 Connecticut Ave., NW Ste 400
Washington, DC 20036

Verizon Wireless
c/o John T. Scott, II &
Donald C. Brittingham
1300 I Street, NW, Ste. 400 W
Washington, DC 20005

Motorola, Inc.
c/o Richard C. Barth, VP & Dir., Telecom Strategy
1350 I Street, NW
Washington, DC 20005

RCC Consultants, Inc.
2000 Linglestown Rd., Ste., 304
Harrisburg, PA 17110

Southern LINC
c/o Christine M. Gill
600 13th Street, NW
Washington, DC 20005

Qualcomm Incorporated
c/o Jennifer M. McCarthy, Senior Dir.
International Government Affairs
5775 Morehouse Drive
San Diego, CA 92121

E.F. Johnson Company
c/o John S. Oblak
299 Johnson Ave., SW
WASECA, MN 56093

Lubrizol Corporation
c/o Charlie Cooley
29400 Lakeland Boulevard
Wickliffe, OH 44092

Kenwood Communications Corp.
c/o Christopher D. Imlay
Booth Freret Imlay & Tepper, PC
5101 Wisconsin Ave., NW Ste., 307
Washington, DC 20016

Avaya
c/o Charles E. Crowders
VP - Gov Affairs
1450 G Street, NW
Washington, DC 20005

Utstarcom, Inc.
c/o Henry Goldberg
Goldberg, Godles, Wiener & Wright
1229 Nineteenth Street, NW
Washington, DC 20036

SmartLink Radio Networks, Inc.
c/o John E. Logan, Attorney
1050 Connecticut Ave., NW 10 Fl.
Washington, DC 20036

M/A-COM Private Radio Systems, Inc.
c/o Robert J. Speidel, Esq.
Manager, Regulatory Policy
PO Box 2000
Lynchburg, VA 24501

RadioSoft
c/o Peter Moncure, Vice President
109 West Knapp Avenue
Edgewater, FL 32132

Sandy Abramson, President
UTAM, Inc.
PO Box 8126
Bridgewater, NJ 08807

Xcel Energy Services, Inc.
c/o Carole C. Harris
McDermott, Will & Emery
600 13TH Street, NW
Washington, DC 20005
Its Attorneys

Ohio MARCS, Program Office
c/o Paul A. Liosis
2885 W. Dublin-Granville Road
Columbus, OH 43235

c/o Peter Tannenwald
Irwin, Campbell & Tannenwald, PC
1730 Rhode Island Ave., NW Ste., 200
The City of Baltimore, Maryland
Washington, DC 20036

Gary Cramer, General Manager
H-D Electric Cooperative, Inc.
PO Box 1007
423 3rd Ave. S.
Clear Lake, SD 57226

FEM Electric Association, Inc.
c/o Paul Erickson, Manager
PO Box 468
800 5th Ave.
Ipswich, SD 57451-0468

NEC America, Inc.
c/o Ari Q. Fitzgerald
Hogan & Hartson, LLP
555 13TH Street, NW
Washington, DC 20004

Consumers Energy Company
c/o Shirley S. Fujimoto
McDermott, Will & Emery
600 13th Street, NW

Steven H. Proctor, Executive Dir.
Utah Communications Agency Network
2451 South 600 West, Ste., 300
Salt Lake City, UT 84115

State of Florida
Kouroush Bastani, P.E. Chief
Information Tech., Prog. Bur of Radio
Ste., 180 of the Capital Circle Office
Center - 4030 Esplanade Way
Tallahassee, Florida, 32399

Northern Electric Cooperative, Inc..
c/o Dennis Hagny, General Manager
PO Box 457
39454 133RD Street
Bath SD 57427

Holy Cross Electric Assoc., Inc.
c/o Richard Brinkley, GM - Reg Serv.
PO Drawer 2150
Glenwood Springs, CO 81602-2150

Jones- Onslow EMC
Thomas E. Pritchard P.E.
259 Western Blvd.
Jacksonville, NC 28546

Codington-Clark Electric Cooperative, Inc.
c/o Gene Ward, General Manager
PO Box 880
3 8TH Ave., SE
Watertown, SD 57201-0880

Kankakee Valley REMC
c/o Dennis C. Weiss, Chief Executive Officer
114 S. Main Street
PO Box 157
Wanatah, IN 46390

Cinergy Corporation
c/o Shirley S. Fujimoto
McDermott, Will & Emery
600 I Street, NW
Washington, DC 20005

White County REMC
c/o Jack R. Lndrum, President & CEO
PO Box 599
Monticello, IN 47960

Carlina Power & Light Company and
TXU Business Services
c/o Jonathan L. Wiener
Goldberg, Godles, Wiener & Wright
1229 19th Street, NW
Washington, DC 20036

Kelller & Heckman, LLP
c/o Melvin W. Bercovici
1001 G Street, NW
Ste., 500 West
Washington, DC 20001

National Association of Counties, *et al*
c/o Robert M. Gurss
Shook Hardy & Bacon, LLP
600 14TH Street, NW Ste., 800
Washington, DC 20005

Southwest Louisiana Electric
Membership Corporation
c/o J. U. Gajan, CEO & GM
PO Box 90866
Lafayette, Louisiana 70509-0866

American Electric Power Comp., Inc.
c/o David B. Trego, VP - Telecom.
1 Riverside Plaza 5th Floor
Columbus, OH 43215

Metropolitan Utilities District
c/o Thomas A. Wurtz, GM
1723 Harney
Omaha, NE 68102

Omaha Public Power District
c/o Diane Kremlacek
Manager - Comm Dept.
444 South 16TH Street Mall
Omaha, NE 68102

Satellite Industry Association
c/o Richard Dalbelo, Executive Dir.
255 Reinekers Lane, Ste., 600
Alexandria, VA 22314

Marnell Corrao Associates
c/o Rick Colvin, Exec. VP
4495 South Polairs, Ave.
Las Vegas, NV 89103

Palomar Communications, *et al*.
c/o Alan S. Tilles, Esq.
Shulman, Rogers, Gandal, Pordy &
Ecker, P.A.
11921 Rockville Pike
Third Floor
Rockville, Maryland 20852

American Mobile Telecommunications
Association, Inc.
c/o Alan R. Shark, President
1130 Connecticut Ave., NW Suite 325
Washington, DC 20036

National Rural
Telecommunications Cooperative
c/o Steven T. Berman
2121 Cooperative Way
Herndon, VA 20171

International Association of Chiefs of Police
c/o William B. Berger, President
515 N. Washington Street
Alexandria, VA 22314-2357

Major Cities Chiefs Association
c/o Jerry Keller, President
Las Vegas Metro Police Dept.
400 Stewart Avenue
Las Vegas, NV 89101

National Sheriff's Association
c/o John Cary Bittick, President
1450 Duke Street
Alexandria, VA 22314

Telecommunications Industry Assoc.
c/o Grant E. Seiffrt
1300 Penn. Ave., NW., Ste., 350
Washington, DC 20004

Society of Broadcast Engineers, Inc.
c/o Booth, Freret, Imley & Tepper
5101 Wisconsin Avenue, NW
Suite 307
Birmingham, AL 35209

Lockheed Martin Corporation
c/o Gerald C. Musarra, Vice President
1725 Jefferson Davis Highway
Crystal Square 2 Suite 403
Arlington, VA 22314

Cellular Telecommunications &
Internet Association
c/o Michael F. Altschul
1250 Connecticut Ave., NW Ste., 800
Washington, DC 20036

The Forestry Conservation
Communications Association
c/o John Berst, President
Pennsylvania Bureau Forestry
PO Box 8552
Harrisburg, PA 17105

Major County Sheriffs' Association
c/o Kevin E. Beary, President
Orange County Sheriff's Office
2400 West 33rd Street
Orlando, FL 32839

National Association of Manufacturers
Arter Hadden, L.L.P.
1801 K Street, NW
3rd Floor
L Street Entrance
Washington, DC 20554

The National Assoc., for Amateur Radio
c/o Christopher D. Imaly
Booth Freret Imaly & Tepper, PC
5101 Wisconsin Avenue NW Ste 307
Washington, DC 2001

National Ready Mixed
Concrete Association
c/o Jennifer LeFevre
900 Spring Street
Silver Spring, MD 20910

Federal Express Corporation
c/o Nathan Lemmon and Richard Dunn
PO Box 727
Memphis, TN 38194

Intel Corporation
c/o Greg S. Slater, Senior Corp., Attorney
M/S/ CH6-404
5000 W Chandler Blvd.
Chandler, AZ 85226

AVR, Inc.
c/o Mark W. Swanson, IT Manager
14698 Galaxie Ave.
Apple Valley, MN 55124

Eastman Chemical Company
c/o Jerry B. Hale
PO Box 511
Kingsport, TN 37662

Aeronautical Radio Inc.
c/o John L. Bartlet
Wiley Rein & Fielding LLP
1776 K Street, NW
Washington, DC 20006

ISG - Cleveland, Inc.
c/o Frank Palazzolo, Project Manager
3100 East 45th Street
Cleveland, OH 44127

The American Petroleum Inst.
c/o Wayne V. Black
Keller and Heckerman, LLP
1001 G Street, NW Ste., 500 West
Washington, DC 20001

American Water Works, Association
c/o Thomas W. Curtis
Deputy Executive Director
1401 New York Ave., NW Ste., 640
Washington, DC 20005

Boeing Company
c/o David A. Nall
Squire Sanders & Dempsey L.L.P.
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, DC 20044-0407

United Telcom Council
c/o Jill M. Lyon, VP & Gen Counsel
1901 Pennsylvania Ave., 5th Floor
Washington, DC 20006

Ameren Corporation
c/o Gerald Bednar
P.O. Box 66149 MC-620
St. Louis, MO 63166-6149

Florida Power & Light company
c/o Lourdes F. Sori
P.O. Box 029100
Miami, FL 33102-029100

Washington Electric Membership Corp.
c/o Robert Chapman
P.O. Box 598
Sandersville, GA 31082

Southeastern Electric Coop., Inc.
c/o Brad Schardin
P.O. Box 388
Marion, SD 57043

Renville Sibley Coop. Power Assoc.
c/o Dale Christensen, CEO
P.O. Box 68
Danube, MN 56230-0068

Delmarva Power & Light, *et al.*
c/o Shirley S. Fujimoto
McDermott, Will & Emery
600 13 Street, NW
Washington, DC 20005-3096

National Rural Electric Coop. Assoc.
c/o Eric W. DeSilva
Wiley, Rein & Fielding, LLP
1776 K Street, NW
Washington, DC 20006

Sid Richardson Energy Services Co.
c/o Weldon Wright
201 Main Street, Suite 3000
Fort Worth, TX 76102

East River Electric Power Coop., Inc
c/o Jeffrey L. Nelson
P.O. Box 227
121 SE 1st Street
Madison, SD 57042

Pinnacle West Capital Corp.
c/o Denny L. Brown
P.O. Box 53999 - Mail Station 8878
Phoenix, AZ 85072

Excelon Corporation
c/o Michael S. Pabian
10 South Dearborn Street, 35th Floor
Chicago, IL 60603

Scana Corporation
c/o Carole C. Harris and Kirk Burgee
McDermott, Will & Emery
600 13th Street, NW
Washington, DC 20005-3096

Duke Energy Corp.
c/o Tara B. Shostek
Irwin, Campbell & Tannwenwald, P.C.
1730 Rhode Island Ave., NW Suite 200
Washington, DC 20036-3101

Metropolitan Transit Authority of
Harris County, Texas
c/o Derrick Blount
5700 East Tex Freeway
Houston, TX 77026

Dallas Area Rapid Transit
c/o Jerelyn Arbuckle, Esq.
P.O. Box 660163
Dallas, TX 75266

The New Jersey Transit Authority
c/o Malcolm G. Stevenson
Schwartz, Woods & Miller
1350 Connecticut Ave., NW
Washington, DC 20036

The Amer. Public Trans. Association
c/o William W. Miller, President
1666 K Street, NW
Washington, DC 20006

San Francisco Bay Area Rapid Transit Dist.
c/o James M. Dunn
800 Madison Street
Oakland, CA 94607

Forest Industries Telecommunications
c/o Kenton E. Sturdevant, Exec. VP
871 Country Club Road, Suite A
Eugene, OR 97401

Personal Communications Industry Assoc.
c/o Jay Kitchen, President & CEO
500 Montgomery Street, Suite 700
Alexandria, VA 22314

Industrial Telecommunications Association, Inc.
c/o Laura L. Smith, Esq.
1110 North Glebe Road, Suite 500
Arlington, VA 22201

National Association of Manufacturers
c/o Lawrence A Finerman
1331 Pennsylvania Avenue, NW
Washington, DC 20004

The City of Fort Lauderdale
c/o Mark Pallans
100 North Andrews Avenue
Fort Lauderdale, FL 33301

Association of American Railroads
c/o Thomas J. Keller
50 F Street, NW
Washington, DC 20001

Preferred Communication Systems, Inc.
c/o Charles D. Gusky, Exec. VP
MacArthur Center II
10th Floor
5605 N. MacArthur Boulevard
Irving, Texas 75038

Access Spectrum, LLC
c/o Mark E. Crosby, President
Two Bethesda Metro Center
Bethesda, Maryland 20814

Motient Communications, Inc.
c/o Walter V. Purnell, Jr., President & CEO
10802 Parkridge Boulevard
Reston, VA 20191-5416

Blooston, Mordkofsky, Dickens, Duffy
& Prendergast
c/o John A. Prendergast
2120 L Street, NW., Suite 300
Washington, DC 20037

Island SMR, Inc.
c/o Bill J. Sandford, President & CEO
1088 Bishop Street, Ste 811
Honolulu, HI 96818

Fisher Wireless Services, Inc.
c/o Dana B. Fisher, Jr., President
14530 S. Commercial St.
Blythe, CA 92225

Cascade Two Way Radio
c/o Spencer L. Bahner, Owner
7301 33rd Ave., NE
Seattle, WA 98115

Western Communications, Inc.
c/o Michael A. Lees, President
3106 South Highway 79
Rapid City, SD 57701

Danny Hampton
5453 Rock Service Station Road
Raleigh, NC 27603-9513

The Ad Hoc Wireless Alliance
c/o Russell H. Fox
Mintz, Levin, Cohn, Ferris
Glovsky and Popeo, PC
701 Pennsylvania Ave., NW
Washington, DC 20004-2608

Skitronics, LLC
c/o Dan L. Hardway, General Counsel
9620 Fayetteville Road
Raleigh, NC 27603

Focus 2000 Communications
c/o J. Patrick Barrett, CEO
4495 South Polaris Ave.
Las Vegas, NV 89103

Commercial Radio And Television, Inc.
c/o Roger Combs, VP - GM
4427 South Polaris Ave.
Las Vegas, NV 89103

Bosshard Radio Service
c/o Paul J. Feldman
Feltcher, Held & Hildreth, PLC
1300 North 17th Street
11th Floor
Arlington, VA 22209

State of New York
Office for Technology
State Capitol, ESD
PO Box 2062
Albany NY 12224
Atten: Hanford Thomas

Madison County
Jerry Kane
One Transit Way
Granite City, IL 62040

Aeronautical Radio, Inc.
2551 Riva Road
Annapolis, MD 21401-7465

MRFAC, Inc.
899 A Harrsion Street, SE
Leesburg, VA 201765

Entergy Corp. & Entergy Services, Inc.
c/o Shirley S. Fujimoto and Kirk Burgee
McDermott, Will & Emery
600 13th Street, NW
Washington, DC 20005-3096

ProComm Service Corp.
c/o Henry B. Henderson, President
3805 South Main Street
Blacksburg, VA 24060

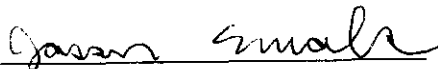
Blooston, Mordkofsky, Dickens,
Duffy & Pendergast
c/o Richard D. Rubino
2120 L. Street, N.W., Suite 300
Washington, D.C. 20037

Fresno Mobile Radio
c/o Bob Cook
160 North Broadway
Fresno, CA 93701

Supreme Radio Communications, Inc.
c/o Dale Tripp
4017 North Prospect Taod
Peoria Heights, IL 61614

C & M Communications, Inc.
c/o Chris Salgot
P.O. Box 6176
Glendale, AZ 85312

Jamestown Communications, Inc.
c/o John Weron
P.O. Box 1933
Jamestown, ND 58402



Jason Emala